

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

FEE APPLICATION COVER SHEET FOR THE PERIOD
JULY 1, 2022 THROUGH JULY 31, 2022

Debtor: LTL Management LLC Applicant: Brown Rudnick LLP
Case No.: 21-30589(MBK) Client: Official Comm of Talc Claimants
Chapter: 11 Case Filed: October 14, 2021

SECTION 1
FEE SUMMARY

☒ Monthly Fee Application No. 9 or ☐ Interim Fee Application No. or ☐ Final Fee Application

Summary of Amounts Requested for the Period from July 1, 2022 through July 31, 2022

Total Fees: \$1,076,430.50¹
Total Disbursements: \$92,269.11
Minus 20% holdback of Fees (\$215,286.10): \$861,144.40
Total Amount Sought To Be Paid at this Time: \$953,413.51

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED (Or Years of Professional Service)	HOURS	RATE ²	FEE
1. Robert J. Stark	Partner 1995	1.0	\$1,685	\$1,685.00
2. David J. Molton	Partner 1983	173.4	\$1,620	\$276,453.00
3. Jeffrey L. Jonas	Partner 1988	10.2	\$1,570	\$16,014.00
4. Philip J. Flink	Partner 1981	4.8	\$1,295	\$6,216.00
5. Eric R. Goodman	Partner 2003	204.0	\$1,260	\$257,040.00
6. Michael S. Winograd	Partner 2001	60.6	\$1,215	\$73,629.00
7. Barbara J. Kelly	Partner 1982	38.7	\$1,170	\$45,279.00
8. Sunni P. Beville	Partner 2002	44.2	\$1,155	\$44,294.25
9. Marek P. Krzyzowski	Partner 2005	3.3	\$1,055	\$3,481.50
10. Kenneth Aulet	Partner 2012	1.4	\$1,025	\$1,435.00
11. D. Cameron Moxley	Partner 2005	.7	\$1,025	\$717.50

¹ Brown Rudnick excluded fees in the amount of \$22,668.00 in respect of transient timekeepers and other voluntary reductions.

² Rates in this statement reflect the annual rate increase disclosed in our retention application.

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED (Or Years of Professional Service)	HOURS	RATE ²	FEE
12. Gerard T. Cicero	Associate 2015	104.0	\$955	\$98,508.25
13. Shari I. Dwoskin	Partner 2014	39.3	\$905	\$35,566.50
14. Tia C. Wallach	Associate 2013	24.8	\$905	\$22,444.00
15. Michael W. Reining	Associate 2015	35.0	\$890	\$31,150.00
16. Susan Sieger-Grimm	Counsel 1994	120.0	\$845	\$112,117.00
17. W. Lydell Benson, Jr.	Associate 2022	18.9	\$685	\$12,946.50
18. Joseph A. Archambeau	Law Clerk / Awaiting Admission	8.4	\$635	\$5,334.00
19. Matthew M. Sawyer	Associate 2019	20.7	\$630	\$13,041.00
20. Meredith A. McCaffrey	Associate 2021	4.1	\$565	\$2,316.50
21. Harriet E. Cohen	Paralegal	31.5	\$455	\$14,332.50
22. Susan G. Oldham	Paralegal	5.4	\$450	\$2,430.00
TOTALS		954.4		\$1,076,430.50

Fee Totals: \$1,076,430.50

Disbursements Totals: \$92,269.11

Total Fee Application \$1,168,699.61

**SECTION II SUMMARY
OF SERVICES**

SERVICES RENDERED	HOURS	FEE
a) Asset Analysis and Recovery: Identification and review of potential assets including causes of action and non-litigation recoveries.	0.0	\$0.00
b) Asset Disposition Sales, leases, abandonment and related transaction work.	0.0	\$0.00
c) Avoidance Action Litigation Preference and fraudulent transfer litigation.	2.2	\$3,564.00
d) Business Operations Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.	0.0	\$0.00
e) Case Administration Coordination and compliance activities, including preparation of statement of financial affairs, schedules, list of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquiries.	75.2	\$58,919.00
f) Claims Administration and Objections Specific claim inquiries; bar date motions; analyses, objections and allowance of claims.	0.0	\$0.00
g) Employee Benefits/Pensions Review issues such as severance, retention, 401K coverage and continuance of pension plan.	0.0	\$0.00
h) Fee/Employment Applications Preparations of employment and fee applications for self or others; motions to Establish interim procedures.	5.9	\$4,184.50
i) Fee/Employment Objections Review of an objections to the employment and fee applications of others.	0.0	\$0.00
j) Financing Matters under 361, 363 and 364 including cash collateral and secured claims; loan document analysis.	0.0	\$0.00
k) Litigation Other than Avoidance Action Litigation (there should be a separate category established for each major matter).	253.5	\$281,281.50
l) Meetings of Creditors Preparing for and attending the conference of creditors, the 341(a) meeting and creditors' committee meetings.	99.1	\$112,466.50
m) Plan and Disclosure Statement Formulation, presentation and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims.	316.9	\$369,470.00
n) Relief from Stay Proceedings Matters relating to termination or continuation of automatic stay under 362.	24.8	\$37,743.50

SERVICES RENDERED	HOURS	FEE
o) Accounting/Auditing Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis.	0.0	\$0.00
p) Business Analysis Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies.	0.0	\$0.00
q) Corporate Finance Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries.	0.0	\$0.00
r) Data Analysis Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc.	0.0	\$0.00
s) Litigation Consulting Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.	0.0	\$0.00
t) Reconstruction Accounting Reconstructing books and records from past transactions and bringing accounting current.	0.0	\$0.00
u) Tax Issues Analysis of tax issues and preparation of state and federal tax returns.	0.0	\$0.00
v) Valuation Appraise or review appraisals of assets.	0.0	\$0.00
w) Travel Time (billed @ 50%)	24.1	\$14,506.50
x) Committee Governance Matters Analysis regarding committee governance matters, including creation of by-laws and addressing other governance matters.	0.0	\$0.00
y) Investigation and Due Diligence Investigation and analysis of prepetition transactions and activities of the Debtor and related entities and assessment of potential claims and causes of action.	0.0	\$0.00
z) Hearings Preparation for and attendance at hearings.	89.4	\$108,727.50
aa) Mediation Preparation for and attendance at mediation.	63.3	\$85,567.50
SERVICE TOTALS:	954.4	\$1,076,430.50

**SECTION III
SUMMARY OF DISBURSEMENTS**

DISBURSEMENTS	AMOUNT
a) Filing Fees Payable to Clerk of Court.	\$269.86
b) Computer Assisted Legal Research Westlaw, Lexis and a description of manner calculated. Westlaw and LEXIS at vendor cost.	\$2,562.00
c) Pacer Fees Payable to the Pacer Service Center for search and/or print.	\$468.60
d) Fax Include per page fee charged.	\$0.00
e) Case Specific Telephone/Conference Call Charges Exclusive of overhead charges. Court-Solutions	\$0.00
f) In-house Reproduction Services Exclusive of overhead charges.	\$373.40
g) Outside Reproduction Services Including scanning services. This includes trial preparation.	\$47.00
h) Other Research Title searches, UCC searches, Asset searches, Accurint.	\$0.00
i) Court Reporting Transcripts.	\$163.39
j) Travel Mileage, tolls, airfare, parking.	\$14,723.93
k) Courier & Express Carriers Overnight and personal delivery.	\$30.00
l) Postage	\$0.00
m) Other (specify) Professional Services BRI LLC In-House Investigative Services.	\$2,025.00
n) Other (specify) Appellate Consulting and Printing Services	\$70,778.93
o) Other (specify) Professional Services	\$0.00
p) Other (specify) Deposition Services	\$0.00
q) Other (specify) Meals	\$586.00
r) Other (specify) eDiscovery Hosting In-House eDiscovery platform.	\$241.00
DISBURSEMENTS TOTAL:	\$92,269.11

I certify under penalty of perjury that the above is true.

Date: August 4, 2022

/s/ Sunni P. Beville

BROWN RUDNICK LLP (“Brown Rudnick”) submits this Ninth Monthly Fee Statement of Brown Rudnick LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Co-Counsel for The Official Committee of Talc Claimants for the Period from July 1, 2022 through July 31, 2022 (“Ninth Monthly Fee Statement”), pursuant to the Order Establishing Procedures for the Allowance of Interim Compensation and Reimbursement of Expenses of Retained Professionals entered on December 9, 2021 [Docket No. 761] (the “Interim Compensation Order”) and the Modified Order Establishing Procedures for the Allowance of Interim Compensation and Reimbursement of Expenses of Retained Professionals entered on December 17, 2021 [Docket No. 870] (the “Modified Interim Compensation Order”).

WHEREFORE, Brown Rudnick respectfully requests payment of fees for the Ninth Monthly Fee Statement in the sum of \$861,144.40, together with expenses of \$92,269.11, for a total requested payment of \$953,413.51, in accordance with the terms of the Interim Compensation Order and the Modified Interim Compensation Order.

Dated: August 4, 2022

BROWN RUDNICK LLP
*Co-Counsel to Official Committee of
Talc Claimants*

By: /s/ Sunni P. Beville
SUNNI P. BEVILLE